

Remarks

Reconsideration of the application is respectfully requested. Claim 4 was objected to. Claim 4 has now been
5 corrected and should be in full conformance.

Claims 1-10 were rejected under Section 112 as being indefinite. Claims 1-2 have been rewritten to conform to the requirements of Section 112. Claims 3-4, 6-9 have been amended to remove the "when" limitations. Claims 5 and 10 do
10 not contain any "when" limitations and depend upon the fully conforming claim 1. All the claims should now be in full conformance with the requirements of Section 112.

Claims 1-10 were rejected as being anticipated under Section 102(e) in view of Snekenes and as being obvious under
15 Section 103 over Snekenes. These rejections are respectfully traversed.

The amended claim 1 has now been amended to require a closed shunt line extending between the first and second withdrawal positions. The pressure differential between the
20 first and second withdrawal positions either falls below a first predetermined threshold value or rises above a second predetermined threshold value. As a result, the shunt line extending between the first and second withdrawal positions is opened. The system is thus in steady state operations
25 equipped with a closed shunt so that the closed shunt must be opened depending on the pressure differential. The existence of the shunt is thus not optional, instead a requirement in

order to enable a by-pass flow in the shunt line, which conditional opening is the key feature in the method of the present invention.

It is submitted that the cited Snekkenes neither
5 teaches nor suggests the requirements of the amended claim 1.

Applicants cannot see where Snekkenes is teaching or suggesting the step of providing a closed shunt-line that extends between the withdrawal positions. Snekkenes also fails to teach or suggest the pressure differential between
10 the second and first withdrawal positions either falling below a first predetermined threshold value or rising above a second predetermined threshold value to open the shunt line therebetween.

In contrast, Snekkenes teaches that the number of
15 extraction flow should be minimized (paragraph [0025]) and there should be no real drop in pressure between the digester and the pressure diffuser (paragraph [0044]). It is submitted that Snekkenes completely fails to monitor the pressure differences between different withdrawal positions in the
20 digester. The Examiner states that the pressure differential in Snekkenes vessel is monitored by referring to paragraphs [0055-0062]. It should be noted that Snekkenes is concerned with minimizing a pressure drop between the digester and the external pressurized wash (line 17, paragraph 0055) not the
25 pressure differential between withdrawal positions in the digester itself. The text in lines 1-4 of paragraph 0044 also

discusses minimizing the pressure drop between the digester and the pressure diffuser.

It is submitted that nowhere does Snekkenes teach or suggest using a shunt line that extend between the withdrawal
5 positions and comparing the pressure difference between two subsequent withdrawal positions with threshold value so that the shunt line is opened when the pressure difference between two withdrawal positions in the digester either falls below a first predetermined value or rises above a second
10 predetermined value.

Applicants fail to see why a person of ordinary skill in the art would look to Snekkenes to learn about these features when they are completely missing in the cited reference.

15 In view of the above, it is submitted that the amended claim 1 is allowable.

Claims 2-10 are submitted to be allowable because they depend upon the allowable base claim 1 and because each claim includes limitations that are not taught or suggested in
20 the cited references.

The new claim 21 is submitted to be allowable for reasons that are similar to the arguments presented above. For example, none of the cited references teaches or suggests the step of measuring a pressure difference between the second
25 withdrawal position and the first withdrawal position, comparing the pressure difference to a reference value wherein

the pressure difference being different from the reference value, opening the shunt line and establishing a flow of a portion of the cooking liquid in the shunt line, the flow in the shunt line being substantially parallel to the cooking liquid flow in the zone in the digester. The new claim 21 is fully supported. For example, paragraphs [0026 and 0034] of the published corresponding US patent application provide support.

The application is now submitted to be in condition for allowance, and such action is respectfully requested.

Respectfully submitted,

FASTH LAW OFFICES



Rolf Fasth

Registration No. 36,999

ATTORNEY DOCKET NO. 128.1123USN

FASTH LAW OFFICES
26 Pinecrest Plaza, Suite 2
Southern Pines, NC 28387-4301
Telephone: (910) 687-0001
Facsimile: (910) 295-2152
Email: rolf.fasth@fasthlaw.com

cc: Hans Fuxhem/Kerstin Ottersten Rinman
(Your Ref. HFU/00242US/KN)